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August 17, 2022

VIA ECF AND EMAIL

The Honorable Sean H. Lane
U.S. Bankruptcy Court for the Southern District
Of New York
300 Quarropas Street
White Plains, New York 10601

**Re: In re Purdue Pharma L.P., et al., Case No. 19-23649 (SHL)
Purdue Pharma L.P., et al., v. AIG Specialty Insurance Company, et al.,
Adv. Pro. No. 21-07005-SHL (the “Adversary Proceeding”)**

Dear Judge Lane:

We write on behalf of all parties currently involved in the above-captioned Adversary Proceeding, which concerns claims by certain Debtors, the Official Committee of Unsecured Creditors appointed in the Chapter 11 Cases, and the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (collectively, “Plaintiffs”) for insurance coverage for opioid-related claims, to respectfully request your approval of jointly proposed amendments to the Scheduling and Pre-Trial Order (the “Joint Proposed Amended Scheduling and Pre-Trial Order”), filed herewith.¹

The Joint Proposed Amended Scheduling and Pre-Trial Order is intended to provide the time that is necessary to complete the discovery phase of this case. The Scheduling and Pretrial Order currently in place, dated April 11, 2022 (Dkt. No. 224), recognizes that the discovery period may need to be extended if certain milestone events have not been completed. While the parties have made substantial progress with respect to documentary discovery, written discovery, and depositions – including the production of nearly 14 million documents, the exchange of multiple sets of interrogatories and requests for admission, and the beginning of depositions – much remains outstanding. For example, many categories of documentary discovery are ongoing, third-party discovery in response to the approximately roughly 20 subpoenas is incomplete, and in the range of 40 to 50 depositions are left to be scheduled and conducted, as each side expects to take between 20 and 25 depositions. To address this, and as foreshadowed in the July 20, 2022 Case Status Report (Dkt. No. 4970), the Joint Proposed Amended

¹ On June 29, 2021, the Court (Drain, J.) granted certain defendant insurers’ *Joint Motion to Stay the Claims Against Them in the Adversary Proceeding In Favor of Arbitration*, staying all claims against those insurers in accordance with the Court’s ruling.

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Scheduling and Pre-Trial Order would extend the close of fact discovery from September 9, 2022 to February 17, 2023 and adjusts all other dates accordingly.

All parties agree that these scheduling amendments are necessary and respectfully request approval of the Joint Proposed Amended Scheduling and Pre-Trial Order. The parties are available at the Court's convenience to address any questions or concerns the Court may have.

Respectfully submitted,

/s/ Nicholas C. Cramb

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